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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF WYOMING**

**UNITED STATES OF AMERICA,**

Plaintiff,

**v.**

**Case No. L:23-PO-00213-SAH**

**MICHAEL W. MCCOLLUM,**

Defendant.

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**MOTION FOR DETENTION HEARING**

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The United States moves for pretrial detention of the Defendant pursuant to 18 U.S.C. § 3142(e) and (f).

1. Eligibility of Case. This case is eligible for a detention order because the case involves the following:

**Serious risk Defendant will flee**  
**Serious risk obstruction of justice**

2. Reason for Detention. The court should detain the Defendant because there are no conditions of release which will reasonably assure:

**Defendant's appearance as required**  
**Safety of any other person and the community**

3. Rebuttable Presumption. The United States will invoke not the rebuttable presumption against the Defendant under § 3142(e).

4. Time for Detention Hearing. The United States requests the Court conduct the detention hearing:

**After a continuance of three days**

**DATED** this 15<sup>th</sup> day of May, 2023.

NICHOLAS VASSALLO  
United States Attorney

By: /s/ Timothy J. Forwood  
TIMOTHY J. FORWOOD  
Assistant United States Attorney